

European Transparency Regulation Implementation

Regulation 543/2013

About this document

This document sets out National Grid's solution for the GB implementation of the Transparency Regulation.

National Grid issued an industry consultation on the 5th December 2013 with responses required by 19th December 2013. The consultation set out a number of questions and options around the implementation of the European Transparency Regulation. Following analysis of responses this document sets out the National Grid solution for the GB implementation of the Regulation.

National Grid will be holding a industry meeting on the 2nd April 2014 to further discuss the proposed solution and the changes industry participants will need to make to their systems.

Should you wish to discuss any part of this document, please contact Alex Haffner on 01926 65 5838 or by email at alex.haffner@nationalgrid.com.

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Any Questions?

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Document Control

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1.0	7 March 2014	National Grid	Issued to industry



What is the European Transparency Regulation¹?

The European Transparency Regulation (543/2013) was formally published on the 14th June 2013. It requires the establishment by the European Network of Transmission System Operators for Electricity (ENTSO-E) of a central information transparency platform. TSOs are required to submit data in accordance with the Regulation to ENTSO-E who is then required to publish the information on the central platform. The Transparency Regulation has an implementation date of the 4th January 2015.

- 1.1 The European Transparency Regulation (ETR) came into force on 4th July 2013 and has an implementation date of 4th January 2015. The Regulation sets out a requirement for the publication of a common set of data relating to the generation, transportation and consumption of electricity in GB. It places an obligation on primary owners of this data to submit information to National Grid as SO for onward transmission to a Central European Platform (EMFIP).
- 1.2 The European Transparency Regulation has an interaction with BSC Modification P291 which introduced a REMIT² inside information publication page on the BMRS. Parties have the option to submit REMIT outage notifications via National Grid for onward submission to the BMRS. The ETR requires the mandatory publication of all outage data and so REMIT outage notifications will represent a subset of the outage information reported under Transparency.
- 1.3 National Grid has raised BSC Modification P295 to propose that Elexon is the conduit through which National Grid submits ETR data. P295 was approved by the Authority on 22-January-2014. The P295 implementation date is the 16th December 2014, in advance of the formal ETR implementation date of 4th January 2015.
- 1.4 National Grid has carried out an analysis of the data required under the ETR; much of the data required is already submitted to National Grid under the existing industry frameworks and processes and National Grid is undertaking significant changes to its internal IS systems and business processes in order to deliver this data to EMFIP. However, to fully meet the ETR requirements there are four areas which will require additional data submissions from industry participants.
- 1.5 The four areas requiring additional data are listed in Section 5. Section 6 discusses these additional data requirements. Section 6 also captures the P291 REMIT requirements which, whilst not part of the Transparency Regulation, have a close linkage to the Article 15 requirements.
- 1.6 National Grid held an IS workshop on 6th November 2013 which was open to industry participants. This workshop discussed the possible options to obtain the data required under section 2.1 and obtained feedback and industry views on those options.
- 1.7 Following the IS workshop an industry consultation was issued on the 5th December 2013 (closing on the 19th December). This purpose of the consultation was to obtain industry feedback on the potential solutions. Following the consultation National Grid has developed the IS solution for the implementation of the Transparency Regulation.
- 1.8 National Grid will develop and deliver a new system named Market Operation Data Interface System (MODIS). MODIS provides a number of benefits in minimising changes to current and future systems used by National Grid and the industry. The solution is deemed to be the most cost

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

² EU regulation No 1227/2011 on wholesale energy market integrity and transparency (REMIT) has been in force since 28 December 2011. REMIT is aimed at preventing market abuse in wholesale energy markets. P291 introduced an outage publication page on the BMRS. Information will start to be published on the BMRS from December 2014.

effective of the options considered and meets industry concerns of delivery against timescales.

- 1.9 National Grid will be organising regular industry workshops, in particular with industry IS representatives, to clarify data flows and the changes that will be required to industry participants systems. The next workshop is provisionally scheduled for the **2nd April 2014**.
- 1.10 National Grid will also during the course of the project provide regular updates on the development, implementation and testing of the MODIS platform. These updates will be provided through a dedicated webpage on the National Grid website. Details of the webpage will be provided at the next industry meeting (see Section 7).



2 Responses to the consultation

There were five formal responses to the consultation which were received from; Elexon, EDF, E.ON, Scottish Power and Northern Powergrid. The full responses are shown in Annex 1 of this document.

Key considerations put forward by Industry Participants included the following considerations:

- Impact on Industry Participants submitting the information
- Support for standardisation of reporting
- The ability to submit additional information as part of existing flows, rather than making additional separate submissions
- Support for a new specific interface
- Consideration that any new reporting system needs to be robust
- System to accept both manual and interface submission routes
- Confirmation of 24/7 support to allow data to be submitted reliably
- Confirmation of industry timescales for EDL/EDT – EDL*/EDT* and that transition cannot be accommodated in time for January 2015

3 Solution

In considering the comments put forward by consultation respondents, National Grid devised several alternatives. Following an assessment of the risk to meet the statutory requirement of the Transparency Regulation and deliverability of a solution for testing into EMFIP by third quarter 2014 ahead of full implementation by late 2014, National Grid is pursuing the development of a new system to deliver the requirements of the Transparency Regulation for GB.

The new system (MODIS) will be developed to ensure full compliance with the legislation.

4 MODIS System

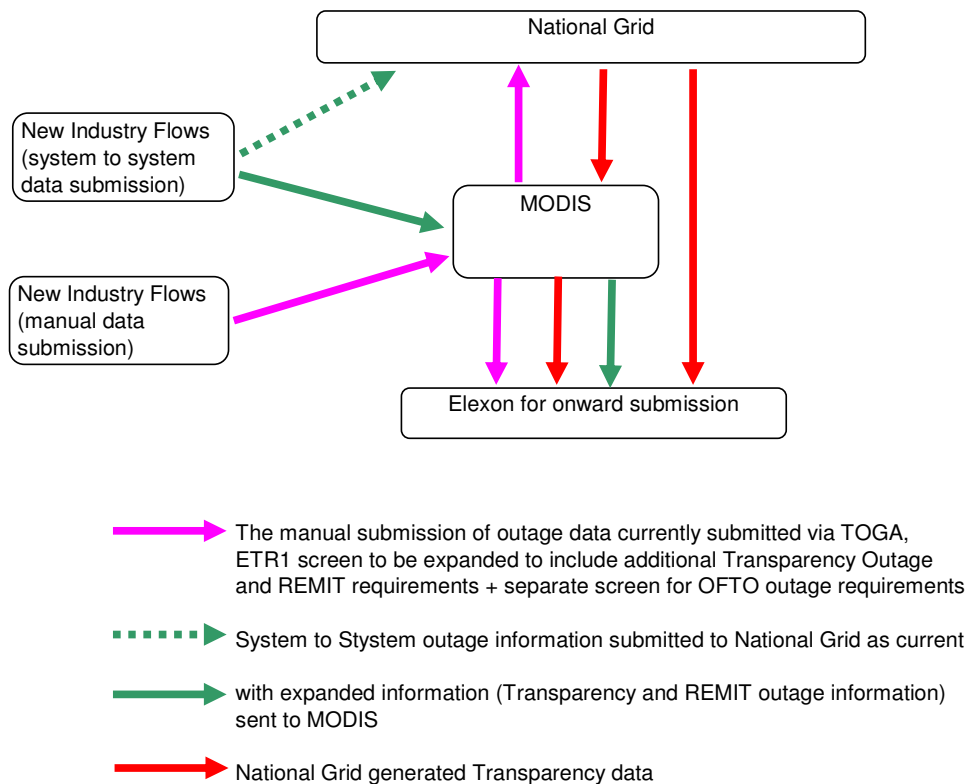
The MODIS system is a robust solution for the delivery of the Transparency project and meets the considerations raised by industry participants. As a new system it will deliver robustness in terms of reporting timescales required whilst also being a cost effective option and minimising changes to existing systems.

The diagram shows how the high level data flows will work with MODIS.

What data needs to be published under the Regulation?

Articles 6 to 17 of the Regulation set out the data that needs to be published.

The data ranges from actual and forecast demands (Article 6); the unavailability of large demand units (Article 7); Year-ahead margin forecasts (Article 8); Transmission Infrastructure changes impacting interconnectors (Article 9); Unavailability of Transmission Infrastructure impacting Interconnectors or Wind feed-in (Article 10); information on the offer and use of interconnector capacity (Article 11 and 12); information on congestion management measures (Article 13); forecast generation (Article 14); generation unavailability (Article 15); actual generation (Article 16) to information on balancing (Article 17)



5 Additional data requirements

5.1 There are four areas of the Transparency Regulation under which more information is required from industry participants. These are listed below.

- Article 7 – Information relating to the unplanned and planned unavailability of transmission and DNO connected demand units greater than a threshold value ($\geq 100\text{MW}$);
- Article 10.1c – Information relating to the unavailability of OFTO infrastructure, if the unavailability has an impact on actual wind power feed-in greater than a threshold value ($\geq 100\text{MW}$);
- Article 14.1a – Publication of the sum of all generation capacity $\geq 1\text{MW}$;
- Article 15 – Information relating to the unavailability of generation and production units greater than a threshold value ($\geq 100\text{MW}$ for generation and $\geq 200\text{MW}$ for Production Units);

5.2 The ETR can be viewed at the link below; Articles 6 to 17 refer to the data reporting requirements.

<http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

5.3 Information will also be required from some industry participants for the P291 REMIT requirements which, whilst not part of the Transparency Regulation, have a close linkage to the Article 15 requirements. The submission of REMIT data, via National Grid, for onward submission to the BMRS is optional. The submission of REMIT Inside Information data can be made either via National Grid, for onward submission to the BMRS, or direct to Elexon via the Elexon Web Portal.

6 Additional Data receipt

6.1 This section discusses the four additional data requirements.

Article 7 data requirements

- 6.2 The Transparency Regulation requirements for Article 7 can be viewed using the link in Section 5 of this document. Article 7 requires the reporting of the planned and unplanned unavailability of consumption units over a 100MW threshold value, with the unavailability lasting at least one settlement period. The information is required from the consumption unit as soon as possible but no later than 1 hour after the change in actual availability.
- 6.3 A consumption unit is defined in the Transparency Regulation as meaning a 'resource receiving electrical energy for its own use, excluding TSOs and DSOs (Distribution System Operators)'. In a GB context this equates to both Transmission and DNO connected individual demand sites.
- 6.4 There are a number of individual demand units registered as BMUs with Elexon and National Grid, exceeding the 100MW threshold limit. National Grid has also contacted DNOs to find out how many, if any, DNO connected demand units meet the threshold as these will also be required to submit the data. Only a very limited number of DNO demand units meet the Transparency Regulation threshold.
- 6.5 Article 7 refers to settlement periods; for the GB market, these are the half-hour settlement periods beginning every hour and at 30 minutes past every hour.
- 6.6 Article 7 also refers to "unavailability of consumption units". In a GB context, for planned outages, this refers to a gap between the registered capacity of consumption units and the actual amount of electricity they are able to consume in a given settlement period (MIL – Maximum Import Limit). The gap only needs to be reported where it exceeds 100MW.
- 6.7 The information will be published in aggregated form on EMFIP and will indicate the sum of unavailable consumption capacity per settlement period. Whilst the information will be published in aggregated form on EMFIP, submission of the information to EMFIP will be in a disaggregated form. A draft form of the REMIT implementing acts, currently going through a European Commission comitology process, states that Article 7(1) information shall be provided to ACER in disaggregated form including the name and location of the consumption unit referred.
- 6.8 Transmission connected demand units currently submit Maximum Import Limit (MIL) data as required under the Grid Code and, whilst information submitted under MIL meets some of the requirements (or could be derived to meet some of the requirements) of Article 7, it does not meet all the requirements and is not submitted by all of the individual units that will be required to submit Article 7 data.

Submission of data for Article 7 by individual GB demand units meeting the threshold.

- 6.9 Data will be submitted to National Grid via MODIS for the data required under Article 7. Demand units will be responsible for the submission of data as required under Article 7, including reason for unavailability, with National Grid submitting all the information for onward aggregated publication on EMFIP. The MODIS specific interface will allow entry by individual demand

units will incorporate functionality for a system to system interface for automated submissions and may include a manual submission method.

- 6.10 Existing submission of MIL data will not be affected by the Article 7 solution and will continue as current.

Article 10.1c data requirements

- 6.11 The Transparency Regulation requirements for Article 10.1c can be viewed using the link in Section 5 of this document. Article 10.1c requires the reporting of changes in the actual availability of off-shore grid infrastructure that reduces wind power feed-in by 100MW or more for at least one settlement period. The information is required to be published as soon as possible but no later than 1 hour after the change in availability.
- 6.12 Article 10.1c requires the reporting of real-time outages but only when those outages restrict wind-power feed-in by more than 100MW. Under this criterion a planned outage would not need to be reported; an incident would also not need to be reported if the reason for the wind power feed-in restriction was because of on-shore DNO or Transmission restrictions.
- 6.13 The occurrence of reported incidences under Article 10.1c is anticipated to be relatively low. National Grid publish an annual report listing the performance of the National Electricity System. The 2012/13³ report saw one unplanned OFTO outage (due to a lightning strike) and which lasted 30 hours. That incident would likely have been reportable under Article 10.1c.
- 6.14 The information currently reported from OFTOs in respect of planned and unplanned outages is not all captured via a single system or does not fully capture all the requirements required under the Transparency Regulation (such as flagging reportable incidents).

Submission of data for Article 10.1c by OFTOs.

- 6.15 Data will be submitted to National Grid via MODIS for data required under Article 10.1c. OFTOs will be responsible for the submission of data as required under Article 10.1c, including reason for unavailability, with National Grid submitting all the information for onward publication on EMFIP. The interface may allow entry by OFTOs via a manual web portal.
- 6.16 Existing submission of OFTO planned and unplanned outage information will not be affected by the Article 10.1c solution and will continue as current.

Article 14.1a data requirements

- 6.17 The Transparency Regulation requirements for Article 14.1a can be viewed using the link in Section 5 of this document. Article 14.1a requires the publication of the sum of all generation units \geq 1MW. The information is required to be published annually no later than one week before the end of the year, the first required formal publication will thus be in December 2015

³ <http://www.nationalgrid.com/NR/rdonlyres/83A0A21D-4267-4983-8109-AA9A4E7B83FD/62630/NationalElectricityTransmissionSystemPerformanceReport20122013.pdf>

(following the formal Transparency implementation date of 4th January 2015).

- 6.18 Some information relating to this is already captured by National Grid via existing business processes. However, in order to fully capture all the data required for this, additional information in relation to small scale generation will be required and it is proposed that DNOs submit this information to National Grid.

Submission of data for Article 14.1a by DNOs.

- 6.19 Article 14.1.a requires the submission of data to EMFIP on an annual basis and the process of obtaining data from DNOs in relation to small scale generation will be incorporated into existing DNO-National Grid business processes.

Article 15 data requirements

- 6.20 The Transparency Regulation requirements for Article 15 can be viewed using the link in Section 5 of this document. Article 15 requires the reporting of information relating to the available capacity during planned and unplanned outages of generation and production units (exceeding a threshold value).
- 6.21 Generation and production units are both defined under Article 2 of the regulation; a 'generation unit' is a single electricity generator belonging to a production unit. A 'production unit' means a facility for generation of electricity made up of a single generation unit or of an aggregation of generation units. For GB, a generation unit is considered to be a BMU with the production unit a power station consisting of several BMUs.
- 6.22 Article 15 refers to settlement periods; for the GB market, these are the half-hour settlement periods beginning every hour and at 30 minutes past every hour.
- 6.23 Article 15 also refers to "unavailability of production/generation units". In a GB context, this refers to a gap between the registered capacity of BMUs/Stations and their declared Maximum Export Limit (MEL) in a given settlement period. The gap only needs to be reported where it exceeds 100MW, and where this occurs for at least one settlement period.
- 6.24 In relation to reporting at a station level, this is only applicable for stations with a capacity of over 200MW. For such stations, changes of 100MW or more are reported, assuming they have not already been reported at the BMU level. The reporting is of availability data (available capacity during event) along with reason for decreased MEL.
- 6.25 Outage information is already submitted in relation to BMUs through existing industry processes however the information submitted does not completely capture the requirements of the Transparency Regulation. Outage information in relation to Production units is not submitted through existing processes and would be a new requirement.
- 6.26 As noted in 6.21 a Production unit consists of an aggregation of generation units. Under the Transparency Regulation the threshold for a production unit to report information under Article 15 is 200MW; the threshold for a generation unit to report data is 100MW. In some instances reporting might be required at the generation unit level and not production unit level and vice versa. The table below show the different reporting options under three different generation set-ups.

- 6.27 Article 15 of the Transparency Regulation has a close relationship with REMIT reporting requirements. P291 proposes to introduce a REMIT inside information reporting platform to the Balancing Mechanism Reporting System (BMRS) website. Participants will be able to submit messages to this platform through existing Grid Code submissions, or through the Elexon Web Portal, provided they have the necessary authorisation. The 'inside information' that can be reported via National Grid will relate to outages.
- 6.28 A significant portion of the data reportable under Transparency and REMIT has commonality. Whilst field names are different, some of the data to be reported shares similarity across the two requirements. However, the REMIT requirements relate only to generation units not production units.

Submission of data for Article 15 and REMIT by generation and production units.

- 6.29 Planned and unplanned data will be submitted to National Grid via MODIS for data required under Article 15 and REMIT. MODIS will allow entry by individual generation and production units via a manual web portal and it will also incorporate functionality for a system to system interface.
- 6.30 Existing submission of MEL data will not be affected by the Article 15 solution and will continue as current.

7 Next Steps

- 7.1 National Grid will be organising further industry meetings in the weeks following this document publication. These meetings will be to discuss the data flows required by the industry. The first of these meetings is planned for the **2nd April 2014**. To be kept informed of these meetings and to receive meeting invites please email: alex.haffner@nationalgrid.com. Attendance by industry IS representatives who will be facilitating change on industry systems will be helpful. National Grid will also be publishing information on the development of the European Transparency solution on a dedicated page on National Grid's website.

ANNEX 1

Consultation Responses:

Annex 1- Response Proforma

National Grid invites responses to this document by **19th December 2013**. The responses to the specific questions (below) or any other aspect of this document can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@nationalgrid.com

Respondent:	Simon Peter Reid
Company Name:	ScottishPower Energy Management Ltd.
Does this response contain confidential information? If yes, please specify.	No

Q. No	Question	Response
1	Q1. Do you have any comments on the options for receiving the new data discussed in sections 3.1 to 3.5 including the utilisation of TOGA versus a new transparency specific interface?	<p>Using a combination of a new Transparency interface system (ETR-specific interface) and existing TOGA may be the most effective method for submitting data to meet the requirements of EMFIP. There could be a role for a modified EDL system leading to a tripartite approach of data collection.</p> <p>The mandatory early adoption of a modified EDT* appears at odds to the planned 5 year transition period currently proposed by National Grid. This project is behind schedule and it is impossible to comment on whether or not to support the mandatory adoption of EDT*. EDT* is, as yet, undeveloped, untested, unproven and uncosted for users. Notwithstanding this, the implementation of the EDT* solution falls outwith the timeframe of this consultation. EDT* is not a data submission system.</p> <p>The preferred solution should be a combination of sources from TOGA, EDL (EDT*) and ETR-specific interface feeding into Elexon's submission to EMFIP.</p> <p>With any solution, be it modifying current systems, future systems or the development and introduction of a new system - needs to be a robust and accurate reporting system in the most cost-efficient manner delivered by [probably] 3rd party developers in a timely manner.</p>
2	Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT to introduce new reason codes may be difficult to achieve for the option listed in the bullet point 1 of 3.3?	<p>The preferred solution should be a combination of sources from TOGA, EDL (EDT*) and ETR-specific interface feeding into Elexon's EMFIP solution. Different users should be able to submit data in different ways – some directly into ETR others via EDL to National Grid to BMRS to ETR. The EDT system is not the format for delivering this solution. The EDL system could deliver the requirements at a cost with modification, testing and then training for staff.</p> <p>Delivering a solution in the timeframe described requires the ETR to be available very shortly to enable 3rd party and in-house IT systems to interface with it before the deadline for submissions. Similarly any changes to EDL require the 3rd party suppliers to deliver a solution that the users can sign-off.</p>

Q. No	Question	Response
3	Q3. Do you have any comments on the workshop view in relation to the issue parties may have with the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?	The implementation of the EDT* solution falls outwith the timeframe of this consultation. In addition, the mandatory early adoption of a modified EDT* appears at odds to the planned 5 year transition period currently proposed by National Grid.
4	Q4. What is your preference of the options listed under 3.3?	The current preference for submission of unplanned outages is via a new ETR-specific interface and modified TOGA system. The EDL and future EDT* solution could be acceptable.
5	Q5. Do you have any other comments on potential data receipt option?	The ETR needs to be user-friendly, easily interfaced with multiple IT systems, secure and reliable 24/7.
6	Q6. Do you have any comments on the proposed solution for the submission of data under Article 7?	The solution for individual demand units appears satisfactory – existing TOGA systems for planned outages (as is for some) should continue and the option of a manual entry and automated data entry on a new ETR-specific interface system should be developed.
7	Q7. Do you have any comments on the proposed solution for the submission of data under Article 10.1c?	The solution for OFTO's seems reasonable using a new ETR-specific interface system. The ETR needs to be user-friendly, easily interfaced with multiple IT systems, secure and reliable, with manual and automated data entry & available 24/7. Other large consumption units may already have EDL systems in place. Any changes to EDL require the 3 rd party suppliers to deliver a solution that the users can sign-off at minimal cost in a timely manner.
8	Q8. Do you have any comments on the section titled Article 14.1a data requirements?	Agree
9	Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?	Our current preference is to submit data via the new ETR-specific interface system. We would consider using an EDL solution if the solution fully meets REMIT requirements, is cost-effective and appropriate for our business.
10	Q10. Do you have any comments on the section titled Article 15 data requirements?	In a GB context, a generation unit is a BMU, however there appears to be little value of the definition given in the consultation of the production unit. We are against the implication of the definition that if a station reduced its overall availability by 100MW or more this would need to be reported despite its six BMUs in that station reducing their availability by less than 17MW each.
11	Q11. Do you have any comments not already captured under previous questions?	

Annex 1- Response Proforma

National Grid invites responses to this document by **19th December 2013**. The responses to the specific questions (below) or any other aspect of this document can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@nationalgrid.com

Respondent:	Alan Creighton
Company Name:	Northern Powergrid
Does this response contain confidential information? If yes, please specify.	No

Q. No	Question	Response
1	Q1. Do you have any comments on the options for receiving the new data discussed in sections 3.1 to 3.5 including the utilisation of TOGA versus a new transparency specific interface?	As a DNO, Northern Powergrid will only need to provide limited information to National Grid and this data set will be a minor development of the data that is currently provided. We agree that this data should be provided via the existing processes wherever possible.
2	Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT to introduce new reason codes may be difficult to achieve for the option listed in the bullet point 1 of 3.3?	Northern Powergrid has no comments.
3	Q3. Do you have any comments on the workshop view in relation to the issue parties may have with the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?	Northern Powergrid has no comments.
4	Q4. What is your preference of the options listed under 3.3?	Northern Powergrid has no comments.
5	Q5. Do you have any other comments on potential data receipt option?	Northern Powergrid has no comments.

Q. No	Question	Response
6	Q6. Do you have any comments on the proposed solution for the submission of data under Article 7?	<p>We agree with National Grid's view that there are no existing arrangements for collecting the required data. Reading through the Transparency Regulations and the consultation document it is not clear to us what the criteria for assessing whether there is a 'planned unavailability of 100MW or more' actually is. Presumably even if the normal operation of a demand unit is not captured within the criteria, but the demand unit has the potential to be caught, then it will need to install the infrastructure and systems required to make the required information available. Given the small number of DNO demand customers required to provide such data, we believe that it this should be collected directly by National Grid as a development of systems used to collect data from transmission connected demand units. In response an enquiry from National Grid, we confirmed that there is one demand unit connected to the Northern Powergrid Yorkshire distribution system that could be required to provide this data. We are comfortable that National Grid liaise directly with this customer to explain the requirement to comply with the ETR and discuss the need, or otherwise, for them to install the appropriate data systems.</p> <p>We are mindful that National Grid currently doesn't have a contractual relationship with distribution connected demand customers and National Grid may like to consider whether it would be appropriate to change the Grid and Distribution Codes to formalise the requirement for larger demand units to provide the required data.</p>
7	Q7. Do you have any comments on the proposed solution for the submission of data under Article 10.1c?	
8	Q8. Do you have any comments on the section titled Article 14.1a data requirements?	Northern Powergrid agrees that the existing industry process for collecting this information should be used. There is currently a joint Grid Code Review Panel / Distribution Code Review Panel working group considering changes to the information provided on small embedded power stations, and the opportunity should be taken to align the revised information exchange to meet the ETR requirements. We are currently working via this workgroup to ensure that in future generation plant is categorised to align with the 'production types' required by the ETR.
9	Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?	No
10	Q10. Do you have any comments on the section titled Article 15 data requirements?	Northern Powergrid has no comments.

Q. No	Question	Response
11	<p>Q11. Do you have any comments not already captured under previous questions?</p>	<p>Article 6 We agree with National Grid's interpretation that the Load Reporting requirement could be interpreted to require real time metering on all demand and generation customers as there is no de minimis limit. We are also concerned that as a DNO we have an obligation to provide National Grid with 'all the relevant information'. However we are reassured that National Grid are of the view that information related to small generation and load units data can be estimated, and we agree that this approach is pragmatic. Given the obligation on DNO to provide data that National Grid require, we would be grateful if National Grid could confirm what, if any, information is needed from us, to enable National Grid to comply with its obligation.</p> <p>Article 8 We believe that the data required to assess the forecast margin is similar to that required for Article 6 in that an understanding of the total load and total generation is required. As for Article 6 there is an obligation to provide National Grid with 'any relevant information', hence we would be grateful if National Grid could confirm what, if any, information is needed from us, to enable National Grid to comply with its obligation.</p> <p>Article 16b There is a requirement for National Grid to report on 'aggregated generation output per market time unit and per production type'. Unlike Article 16 estimated data is not explicitly permitted. As with Article 6, this could be interpreted to require real time metering on all generation customers as there is no de minimis limit. Whilst DNOs have no obligations to provide National Grid with data to enable them to meet this obligation (unlike Article 6 and 8) we would be grateful if National Grid could confirm what, if any, information is needed from us, to enable National Grid to comply with its obligation.</p>

Annex 1- Response Proforma

National Grid invites responses to this document by **19th December 2013**. The responses to the specific questions (below) or any other aspect of this document can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@nationalgrid.com

Respondent:	Esther Sutton
Company Name:	E.ON
Does this response contain confidential information? If yes, please specify.	No

Q. No	Question	Response
1	Q1. Do you have any comments on the options for receiving the new data discussed in sections 3.1 to 3.5 including the utilisation of TOGA versus a new transparency specific interface?	<p>TOGA can at times be a slow system to use that requires a user to login before submitting data; will/can this be addressed if TOGA is used for submitting transparency data? I.e. by development of a TOGA API that would allow planned outage data to be sent directly to TOGA from an internal system, eliminating the need to manually login to TOGA.</p> <p>Would submissions to TOGA be via additions to existing submissions or new file formats?</p> <p>Current TOGA submissions need to be made before a specific cut off time, the assumption is that for transparency data submissions can be done at any time.</p> <p>Some more information on the potential new ETR specific interface would also be helpful to understand what changes/amendments we might need to make to our IT systems for that route.</p>
2	Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT to introduce new reason codes may be difficult to achieve for the option listed in the bullet point 1 of 3.3?	<p>We agree with the workgroup discussions that there may be an issue with the time needed for these changes to be applied to current EDL/EDT interfaces; these may not be achievable in ETR timescales.</p>
3	Q3. Do you have any comments on the workshop view in relation to the issue parties may have with the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?	<p>We agree too that there may also be an issue with the timescales for parties to use EDL*/EDT* in order to comply with the ETR . Early or mandatory submission might be problematic for some parties.</p>
4	Q4. What is your preference of the options listed under 3.3?	<p>E.ON's preference is for submission via TOGA, but with the questions raised in the answer to Q1 addressed.</p>

Q. No	Question	Response
5	Q5. Do you have any other comments on potential data receipt option?	No
6	Q6. Do you have any comments on the proposed solution for the submission of data under Article 7?	For the TOGA option, the questions we raised in answer to Q1.
7	Q7. Do you have any comments on the proposed solution for the submission of data under Article 10.1c?	Again for the TOGA option, the same questions as raised in our answer to Q1.
8	Q8. Do you have any comments on the section titled Article 14.1a data requirements?	No.
9	Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?	Yes.
10	Q10. Do you have any comments on the section titled Article 15 data requirements?	As above for the TOGA option, the questions raised in answer to Q1. As mentioned in the answer to Q3, we also see issue with the early adoption of EDL*/EDT* and the timescales for implementation.
11	Q11. Do you have any comments not already captured under previous questions?	No.

Annex 1- Response Proforma

National Grid invites responses to this document by **19th December 2013**. The responses to the specific questions (below) or any other aspect of this document can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@nationalgrid.com

Respondent:	Martin Mate
Company Name:	EDF Energy
Does this response contain confidential information? If yes, please specify.	No

Q. No	Question	Response
1	Q1. Do you have any comments on the options for receiving the new data discussed in sections 3.1 to 3.5 including the utilisation of TOGA versus a new transparency specific interface?	<p>We assume that reference to planned and unplanned outage data in sections 3.1-3.5 of the consultation means data submitted in accordance with Grid Code planning processes (OC2) and data submitted in balancing processes (BC1,2) respectively. EU regulation 543/2013 refers to planned unavailability and actual availability, but actual availability includes expected availability, and in reality the distinction is unclear. We would welcome clarification of the interpretation of planned and unplanned for GB purposes, though the difference may be irrelevant.</p> <p>In principle, we support standardisation of reporting in the various timescales for which it is required, and for the different purposes for which it is used, rather than the current diversity of methods.</p> <p>However, such a significant change would take considerably longer than a year to effectively specify and implement across GB industry. Given that the underlying requirements are essentially the same across Europe, it would be sensible to devise a standard European approach, and that could take even longer.</p> <p>In practice, given the short timescales for implementation, our initial view is, for the short term, to support minimal change to existing systems and processes. For us that currently means submission of new data items via a new ETR-specific interface or a modified version of TOGA, or via an adaptation of the P291 modification proposal, perhaps with BMRS as the source of data for both NGET and the European central platform.</p> <p>During development of P291 for REMIT, NGET suggested revision of TOGA would be expensive and/or impractical. That suggests that use of a new ETR-specific interface or an adaptation of P291 would be more cost-effective.</p> <p>More detail is required for us to express a clear preference on the proposed methods. The earlier that more detail is provided on the potential options, the more likelihood there is of being able to meet the tight timescales that exist, and develop systems and processes at reasonable cost.</p> <p>We note that Grid Code changes may be required to align the new requirements with existing Grid Code planning, operating and balancing rules.</p>

Q. No	Question	Response
2	Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT to introduce new reason codes may be difficult to achieve for the option listed in the bullet point 1 of 3.3?	<p>Any change to the format and content of EDT/EDL messages would require a considerable lead time, to update software and internal processes affecting many power station control room and trading point staff, and would be very difficult for us to achieve cost-effectively within a year.</p> <p>We expect to continue to use EDT/EDL to notify changes to actual availability and expected availability in “operational” timescales.</p>
3	Q3. Do you have any comments on the workshop view in relation to the issue parties may have with the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?	<p>Changes to new EBS EDT*/EDL* messages could be a sensible way to accommodate new reporting requirements, but it is highly unlikely that we could accept mandatory early adoption for all our generating units within a year.</p>
4	Q4. What is your preference of the options listed under 3.3?	<p>Although changes to EDT/EDL (or EDT*/EDL*) could provide a sensible single approach for the longer term future, we think there would be difficulty implementing changes within a year.</p> <p>Submission of new data requirements via a new ETR-specific interface or modifications to TOGA would have less impact on existing processes, and be more practical in the timescale of a year.</p> <p>There is considerable similarity between REMIT data and data transparency requirements. Could NGET use REMIT data reported on BMRS using P291 functionality, including submission by the Elexon Portal? There seems little value in developing yet another system to receive what is essentially the same data. If so, early consideration of any changes to the P291 detailed functionality would be most effective.</p>
5	Q5. Do you have any other comments on potential data receipt option?	<p>The EU regulation appears to require reporting by individual consumers with capacity over 100 MW.</p> <p>As with REMIT, it should be relatively straightforward for individual sites with that volume to report. Either the consumer could communicate directly with NGET or it’s supplier could communicate on its behalf, given that suppliers to sites this size are likely to have existing communications processes with NGET already. The number of such sites in GB is very small.</p> <p>However, consumers with aggregate demand over 100 MW could be split between different suppliers and DNOs, and the only link between them and NGET may be through suppliers or DNOs. In these cases, new rules to “capture” these consumers may need to come through supply or distribution rule changes.</p>

Q. No	Question	Response
6	Q6. Do you have any comments on the proposed solution for the submission of data under Article 7?	See other comments on the difference between planned and unplanned unavailability, the difference between OC2 data and data by “Market Time Unit” period, and the similarity of REMIT and Data Transparency data.
7	Q7. Do you have any comments on the proposed solution for the submission of data under Article 10.1c?	No, other than to note that OFTOs fall within the GB system and will be required to report to NGET, while GB interconnectors are considered separate from the GB system and will report directly to the central platform in their own right.
8	Q8. Do you have any comments on the section titled Article 14.1a data requirements?	The aggregate of small licence exempt generation connected to distribution can easily exceed 100 MW, and aggregate unavailability could have the same impact on system and market operation as unavailability of individual larger generating units or large demand sites. The Transparency regulations do not appear to consider aggregate small generation in the same way as demand. Similarly, the availability and unavailability of aggregate demand response does not appear to be considered. We assume the EU does not consider common cause from these sources affecting market prices likely in the near future.
9	Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon’s platform?	No, not in the timescale of a year. Our expectation is to submit REMIT data via the Elexon Portal for publishing on BMRS.
10	Q10. Do you have any comments on the section titled Article 15 data requirements?	For Production Units (power stations) which would be captured by the requirement for reporting, we would hope to provide data at generation BM Unit level and rely on NGET to aggregate the data, rather than have to submit a new data item effectively duplicating the BM Unit level data. This would require a generator commitment to report all changes that would result in a Production Unit availability change more than 100 MW.
11	Q11. Do you have any comments not already captured under previous questions?	Many areas of the regulation appear open to interpretation. Until there is more clarity on exactly what information will be required from us, as an operator of generating units and production units, as a supplier to consumers with large sites and to consumers with a number of smaller sites amounting to a large volume, views expressed in this response remain provisional. We provide some examples below where our understanding is incomplete, and NGET should seek to provide more clarity.

Forecast Availability in different timescales

In EU regulation 543/2013, a distinction is made between planned unavailability and actual availability. In reality, the time at which a revised expectation becomes planned as a “known event” can be subjective. In GB, there is a difference between unavailability that has in effect been agreed in advance with National Grid under the Grid Code planning process, and unavailability that occurs unexpectedly at short notice outside the timetabled planning process. The interpretation for GB appears to be:

- Planned unavailability is taken to correspond with output usable and synchronisation and de-synchronisation times provided in OC2 data submissions applicable for 2 days in the future and beyond, under the Grid Code (using TOGA).
- “Unplanned unavailability” (expressed in the regulation in terms of actual availability changed in some unspecified short timescale from previously planned availability) is taken to correspond with changes to data previously published in OC2 data submissions, that mainly occur between such submissions or after the last OC2 submission for a day. These are currently reported to NGET through EDT/EDL submissions for periods in the near future, and to the wider market through REMIT declarations. In the case of plant failures or other events occurring unexpectedly, EDL submissions for the immediate future are made quickly, but EDT/EDL/REMIT messages indicating the full revised future expectation may be delayed a short while until the circumstances have been assessed. Successive revisions of expectation may be notified until a firm revised plan is agreed internally and notified in REMIT messages and/or OC2 data submission.

Historic evolutions have resulted in forecast generation and demand availability data being provided to NGET and the market using different systems in different timescales, with differences in the detail of the data provided. REMIT and EU Transparency Regulations have added to the diversity of reporting required for what is essentially the same data, and the EU Transparency Regulations also draw some consumers into availability reporting, and network operators into network availability reporting requirements.

In future, we anticipate that the distinction between planned and actual/unplanned availability described in EU Regulation 543/2013, and between data provided in GB Grid Code OC2 planning timescales and data in day-ahead and balancing timescales, will reduce. In reality, the data is a continuum of expectation culminating in out-turn availability in realtime. The requirement could be interpreted to be an initial forecast 3 years ahead, with revisions as and when they occur, including filling in detail at finer time resolutions at specified time thresholds as realtime is approached.

Market Time Unit

OC2 output usable data is not currently provided at the resolution of “Market Time Unit” (the smallest period of time for which a market price has been established). OC2 data only considers availability at selected times of system peak demand.

REMIT data and data submitted by EDT/EDL is more likely to be provided at the resolution of Market Time Unit.

A clear statement on the Market Time Units expected to be used for various timescales for the purpose of the transparency regulation should be provided.

Consumers with aggregate demand capacity above 100 MW

Clarity is required on whether data will be required from consumers with aggregate demand capacity above 100 MW. If it is, then suppliers may be required to communicate this to consumers, and suppliers may be requested by consumers to assist in communication with National Grid. Early clarification of this will reduce uncertainty and costs in developing solutions.

Production Unit comprising many small generators owned by or registered to the same party

If "production unit" were interpreted to include aggregations of smaller generating units owned by, or registered by, a market participant in the wider sense, including wind and solar included in supplier BM Units, another level of generation reporting would be introduced.

Although mostly registered by suppliers in GB, these are usually owned by third parties, and they present different issues for capacity and scheduling, as well as output reporting. They seem fall in a grey area under EU regulation, with TSOs and markets expected to forecast based on incomplete information on total available capacity.

Demand reduction capability

Voluntary demand reduction capability, either at individual sites, or at aggregations of smaller sites (which may include small generation) could be significant for system or market operation in future, but is not explicitly covered by the Data Transparency regulation.

Article 16 – Actual Generation

Paragraph 4.28 says that NGET will use metered information where possible and estimates if metered data is not available. It may be useful to know what contribution to the total is metered, and what is estimated.

Article 17 – Balancing

Some of the reporting targets will be difficult to achieve with clarity and accuracy, both for reserve and activation, given the wide variety of services contracted by NGET. The timescales for determining actual delivered balancing volumes and costs may be days for some services (eg. maximum generation, frequency response, demand response). Bids, offers, and balancing services data provide a starting point.

Harmonisation of balancing across the EU may in future require additional or alternative reporting of balancing services availability and delivery, both by providers to NGET, and to the market. Although some of this is beyond the immediate horizon of the Transparency Regulation (Article 17), NGET and GB participants will undoubtedly have to consider the exchange of information relating to standard balancing products in the future.

Electricity Market Reform - Capacity Mechanism

In considering future interfaces for exchange of information with participants, NGET may wish to consider information requirements for Capacity Mechanism Units under the Capacity Mechanism.

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Respondent:	David Kemp
Company Name:	ELEXON
Does this response contain confidential information? If yes, please specify.	No

Q. No	Question	Response
1	Q1. Do you have any comments on the options for receiving the new data discussed in sections 3.1 to 3.5 including the utilisation of TOGA versus a new transparency specific interface?	<p>The options listed cover all the viable submission routes, either by utilising the relevant existing routes or by creating a new interface.</p> <p>It may be more beneficial to participants under the Grid Code to be able to submit the additional information as part of existing flows, rather than needing to make an additional submission via a separate Transparency-specific interface. However, a separate interface may be better if there are any non-Grid Code participants who need to submit information to the Transmission Company under the Transparency regulation.</p> <p>When deciding which option to go for, we believe National Grid should ensure it takes into account the impact on the participants who will be submitting information, as the most effective option for National Grid may not be the most effective option for participants to use.</p>
2	Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT to introduce new reason codes may be difficult to achieve for the option listed in the bullet point 1 of 3.3?	No.
3	Q3. Do you have any comments on the workshop view in relation to the issue parties may have with the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?	No.
4	Q4. What is your preference of the options listed under 3.3?	ELEXON has no preference on which option would be best. However, we would like to reiterate the comment made under Question 1 that National Grid should take into account the impact on participants when deciding which option it goes for.

Q. No	Question	Response
5	Q5. Do you have any other comments on potential data receipt option?	No.
6	Q6. Do you have any comments on the proposed solution for the submission of data under Article 7?	No.
7	Q7. Do you have any comments on the proposed solution for the submission of data under Article 10.1c?	No.
8	Q8. Do you have any comments on the section titled Article 14.1a data requirements?	No.
9	Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?	<p>No, however ELEXON notes the following with regards to data submission.</p> <p>One of your potential options for allowing participants to submit REMIT messages to the BMRS platform under Approved BSC Modification P291 is the use of a manual web platform with functionality for system-to-system interfaces. This would essentially duplicate the functionality that will be on offer to participants under the ELEXON Portal submission route.</p> <p>We highlight that the intent of introducing the Transmission Company submission route under P291 was to allow participants to include REMIT messages as part of existing submissions made under the Grid Code. The P291 Workgroup considered that the vast majority of REMIT messages that would be submitted to the BMRS platform would relate to outages that are already reported to the Transmission Company under the Grid Code. It was therefore considered that incorporating the additional information required for a REMIT message into the existing flows would allow these participants to submit all the necessary information in a single submission. Further information on the P291 Workgroup's discussions can be found in the P291 Final Modification Report.</p> <p>We believe that whatever process National Grid puts in place to receive REMIT messages should require minimal additional effort on the part of participants over their mandatory submission requirements, as per the intent of the P291 Workgroup.</p>
10	Q10. Do you have any comments on the section titled Article 15 data requirements?	No.

Q. No	Question	Response
11	<p>Q11. Do you have any comments not already captured under previous questions?</p>	<p>Responsibility as data owner</p> <p>ELEXON will be considered the primary data owner for a few data items required under the Transparency regulation, specifically the information required under Articles 16.1(a), 16.1(b), 16.1(c), 17.1(g) and 17.1(h).</p> <p>If Proposed BSC Modification P295 is approved, ELEXON will provide this information directly to the ENTSO-E. Under this scenario, ELEXON would register as a data provider for these five items under Article 4(2). ELEXON would also act as the conduit for the Transmission Company to submit the rest of the data to the ENTSO-E.</p> <p>If P295 is rejected, we would work closely with National Grid to ensure these files are sent to the ENTSO-E in the most effective way, but at this time we anticipate that in this scenario ELEXON would provide its information to the Transmission Company for onward submission to the ENTSO-E.</p> <p>Further information is available in the P295 Final Modification Report.</p>